

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN SECTION OF TENNESSEE  
WESTERN DIVISION

SCOTT TURNAGE , CORTEZ D. BROWN,  
DEONTAE TATE, JEREMY S. MELTON,  
ESTATE OF ISSACCA POWELL,  
KEITH BURGESS, TRAVIS BOYD,  
TERRENCE DRAIN, and KIMBERLY ALLEN on  
behalf of themselves and all similarly situated persons,

PLAINTIFFS,

v.

BILL OLDHAM, in his individual capacity as former  
Sheriff of Shelby County, Tennessee; FLOYD  
BONNER, JR., in his official capacity as Sheriff of  
Shelby County, Tennessee; ROBERT MOORE, in his  
individual capacity as former Jail Director of Shelby  
County, Tennessee; KIRK FIELDS, in his official  
capacity as Jail Director of Shelby County, Tennessee;  
CHARLENE MCGHEE, in her individual capacity as  
former Assistant Chief of Jail Security of Shelby County,  
Tennessee; REGINALD HUBBARD, in his official  
capacity as Assistant Chief of Jail Security of Shelby  
County, Tennessee; DEBRA HAMMONS, in her  
individual capacity as former Assistant Chief of Jail  
Programs of Shelby County, Tennessee; TIFFANY  
WARD in her official capacity as Assistant Chief of Jail  
Programs of Shelby County, Tennessee; SHELBY  
COUNTY, TENNESSEE, a Tennessee municipality;  
TYLER TECHNOLOGIES, INC., a foreign corporation;  
GLOBAL TEL\*LINK CORPORATION, a foreign  
corporation; SOFTWARE AG USA, INC., a foreign  
corporation; and SIERRA-CEDAR, INC., a foreign  
corporation, SIERRA SYSTEMS GROUP, INC., a  
foreign corporation; and TETRUS CORP, a foreign  
corporation.

DEFENDANTS.

**Case No. 2:16-cv-2907-  
SHM/tmp**

**CLASS ACTION  
COMPLAINT FOR  
VIOLATIONS OF THE  
CIVIL RIGHTS ACT OF  
1871, 42 U.S.C. § 1983,  
TENNESSEE COMMON  
LAW, DECLARATORY, AND  
INJUNCTIVE RELIEF**

**JURY TRIAL DEMANDED  
PURSUANT TO FED. R.  
CIV. PRO. 38(a) & (b)**

---

NOTICE OF FILING THE DECLARATION OF AUBREY BROWN, AS ADMINISTRATOR  
AD LITEM FOR THE ESTATE OF ISSACCA POWELL IN FURTHER SUPPORT OF  
‘MOTION FOR AWARD OF ATTORNEY’S FEES, REIMBURSEMENT OF EXPENSES,  
AND INCENTIVE AWARDS TO PLAINTIFFS’

---

COME NOW Plaintiffs, Scott Turnage, Deontae Tate, Jeremy S. Melton, Aubrey L. Brown, as Administrator ad Litem of the Estate of Issacca Powell, Keith Burgess, Travis Boyd, Terrence Drain, and Kimberly Allen, hereby files their *Notice of Filing the Declaration of Aubrey Brown, as Administrator ad Litem for the Estate of Issacca Powell in further Support of ‘Motion for Award of Attorneys Fees, Reimbursement of Expenses, and Incentive Awards to Plaintiffs’* (Motion filed as ECF 380). A copy of the Declaration is attached hereto.

Respectfully submitted,

/s/Brice M. Timmons

Brice M. Timmons (TN #29582)\*

Craig A. Edgington (TN #38205)\*

DONATI LAW, PLLC

1545 Union Ave.

Memphis, Tennessee 38104

(901) 278-1004 – Phone

(901) 278-3111 – Facsimile

[brice@donatilaw.com](mailto:brice@donatilaw.com)

[craig@donatilaw.com](mailto:craig@donatilaw.com)

/s/William E. Routt, III

William E. Routt (TN #28577)\*

Frank L. Watson, III (TN #15073)\*

William F. Burns (TN #17908)\*

WATSON BURNS, PLLC

253 Adams Avenue

Memphis, Tennessee 38104

(901) 529-7966 – Phone

(901) 529-7998 – Facsimile

[wroutt@watsonburns.com](mailto:wroutt@watsonburns.com)

[fwatson@watsonburns.com](mailto:fwatson@watsonburns.com)

[bburns@watsonburns.com](mailto:bburns@watsonburns.com)

/s/William E. Cochran, Jr.

William E. Cochran, Jr. (TN #21428)\*

Michael G. McLaren (TN #5100)\*

BLACK MCLAREN JONES

RYLAND & GRIFFEE PC

530 Oak Court Drive, Suite 360

Memphis, Tennessee 38117

(901) 762-0535 – Phone

(901) 762-0539 – Facsimile

[wcochran@blackmclaw.com](mailto:wcochran@blackmclaw.com)

[mmclaren@blackmclaw.com](mailto:mmclaren@blackmclaw.com)

*\*Counsel for the named Plaintiffs and Court Appointed Rule 23(g)(3) Interim Class Counsel for the putative Class Members.*

### **CERTIFICATE OF SERVICE**

I hereby certify that on this October 28, 2021, a true and correct copy of the foregoing has been filed electronically with the Court's ECF system and served on all parties to this action via the Court's Electronic Case Filing System this 28<sup>th</sup> day of October 2021.

/s/Brice M. Timmons